

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JEANNE DEGAN,)	CIVIL ACTION NO. 04CV11024 RWZ
)	
Plaintiff,)	Jonathan R. Sigel
)	BBO# 559850
v.)	
)	
GOLDWELL OF NEW ENGLAND,)	
INC. and R.G. SHAKOUR, INC.)	
)	
Defendants.)	

**ASSENTED TO MOTION TO EXTEND TIME TO FILE REPLY
AND TO CONTINUE HEARING ON DEFENDANTS' MOTION**

Pursuant to Rule 7.1(A)(1) of the Local Rules of the United States District Court for the District of Massachusetts, Defendants Goldwell of New England, Inc. and R.G. Shakour, Inc. respectfully request the Court to extend the Scheduling Order in this case as follows: (1) extend the time for Defendants to file their Reply to Plaintiff's Opposition to August 15, 2005; and (2) continue the hearing on Defendants' dispositive motion to August 30 or August 31, 2005.

As grounds for their *assented to* motion, Defendants state as follows:

1. Pursuant to an Order entered by the Court at a Status Conference on April 12, 2005, the calendar of events for Defendants' Motion for Summary Judgment was established as follows: (a) Defendants' dispositive motion to be filed on or before June 30, 2005; (b) Plaintiff's opposition to Defendants' dispositive motion to be filed on or before July 29, 2005; (c) Defendants' reply to Plaintiff's opposition to be filed on or before August 5, 2005; and (d) hearing on Defendants' dispositive motion to be held on August 10, 2005.

2. Since the initial Order, the parties have moved the Court to reschedule the dates for the filing of: (a) Defendants' dispositive motion (to July 8, 2005); and (b) Plaintiff's opposition to

Defendants' dispositive motion (to August 8, 2005). However, the parties have not moved to reschedule the subsequent deadlines.

3. In order to accommodate the previously-requested rescheduling, the entire calendar of events regarding Defendants' dispositive motion should be adjusted. Absent such adjustment, Defendants will be deprived of a reasonable opportunity to file a Reply to Plaintiff's Opposition prior to the scheduled hearing.

4. Due to vacation scheduling, Defendants' counsel will be unavailable to attend a hearing during the period August 16, 2005 through August 26, 2005.

5. Due to appellate argument and trial scheduling, Plaintiff's counsel will be largely unavailable to attend a hearing after August 31, 2005.

6. Counsel for Plaintiff assents to this motion, provided that the hearing date can be scheduled on August 30 or August 31, 2005.

WHEREFORE, Defendants Goldwell of New England, Inc. and R.G. Shakour, Inc. respectfully request the Court to extend the Scheduling Order in this case as follows: (1) extend the time for Defendants to file their Reply to Plaintiff's Opposition to August 15, 2005; and (2) continue the hearing on Defendants' dispositive motion to August 30 or August 31, 2005.

ASSENTED TO:

JEANNE DEGAN

By her attorneys,



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GOLDWELL OF NEW ENGLAND, INC.
and R.G. SHAKOUR, INC.

By their attorneys,



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Dated: July 11, 2005